

EX PARTE OR LATE FILED

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

March 30, 2000

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APR - 3 2000

FCC MAIL ROOM

In the Matter of)
The Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)
And FCC 97-51 - Further Notice of Proposed)
Rulemaking)
)

CC Docket No. 92-105

ORIGINAL

EXPARTE COMMENTS
OF THE
MARYLAND DEPARTMENT OF BUDGET & MANAGEMENT

We respectfully request that the FCC mandate the use of 7-1-1 for Telecommunications Relay Service (TRS) nationwide.

The State of Maryland with the full cooperation of Bell Atlantic, initiated the use of 7-1-1 in February of 1999. It has been over a year since 7-1-1 was introduced in Maryland and the results continue to be overwhelmingly positive. Voice initiated calls have increased significantly and public awareness is at an all time high. Unfortunately not all LEC's, payphones, cellular and PBX/ systems are accessible. Some are still refusing to allow 7-1-1 to be accessed on their networks until it is mandated by the FCC.

In our experience, businesses, the hearing population, as well as the disabled communities that use TRS daily have benefited greatly from 7-1-1 access.

For almost every TRS call placed by a person using a TTY/Text Telephone, there is a person without a hearing or speech disability on the other end. With the introduction of 7-1-1, voice initiated calls increased immediately after the first full month of operation. This increase continued at an average of 18% per month for the first full year of 7-1-1 service. This occurred after seven years of virtually no increase in the number of voice initiated calls. Customer feedback tells us that, this increase is due to the ease with which people can now access the relay and contact TTY users. Before 7-1-1, many TRS users who needed a return call from a business would leave the eleven digit number for the Maryland Relay, in addition, they would leave their own ten digit phone number. They would then explain how to process the call. This was an overload of

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information and resulted in confusing many business people. As a consequence, the call was not returned. This process has been greatly simplified with the advent of 7-1-1. A large number of our TRS users are reporting a significant increase in “call backs” when they leave 7-1-1 and their number with businesses, friends, and family. This increase is substantiated by the growth in the call volume of voice initiated calls.

In contrast, there has been a decrease in the number of TTY initiated calls. Although it is not a proportionate decrease in the TTY initiated calls, there has been a decrease none-the-less. Again the evidence points to the fact that TTY users have to call the person or company less often because they are reporting more frequent return calls in response to their initial contact.

The potential impact to the business community is unlimited. Businesses now have easy, fast access to the millions of potential customers they could not contact prior to TRS, as well as renewed access to the ever-increasing population of senior citizens with hearing and/or speech loss. With TRS, people who have lost the ability to use the phone after years of conducting the business of their lives on the telephone are now getting reconnected through TRS. With 7-1-1, businesses can reconnect to their customers in a fast and simple way.

7-1-1 is an effective tool for businesses and people not familiar with TRS and the various ways to connect to their local TRS. Clearly, the proof of the overall success of 7-1-1 access lies in the fact that 49% of all calls into the Maryland Relay Center are now connected by dialing the 7-1-1 number as opposed to dialing Maryland’s other toll-free numbers.

Maryland’s decision to keep all of our existing toll free numbers was made for several reasons. First, many Maryland residents travelling to other states prefer to use the Maryland Relay. Maintaining our existing numbers give our citizens a choice. Secondly, the toll free numbers are for persons who have their call type branded on their home lines. We suggest that persons who do have their home line branded as a TTY user, VCO user, or ASCII user, pre-program the appropriate toll free number in a memory button on the phone. In this manner they can press one button for speed dialing to TRS and always be connected in the appropriate mode first. If this same person has family members who use a standard phone, they can dial 7-1-1, which does not have call type branding, and always get an operator (CA) speaking to them first.

In addition, Maryland has recently introduced two new dedicated toll free numbers for VCO and ASCII callers to ensure that our customers have a choice of how to contact Maryland

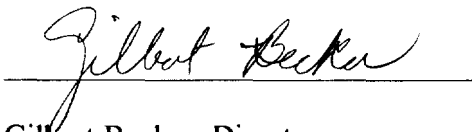
Relay when they are home or away from home. These dedicated numbers have proven to significantly increase the average speed of answer for these two call types.

In Maryland, the operator (Communications Assistant) answers the 7-1-1 number first in voice mode. In this way, the hearing person does not hear the TTY tones when the TRS center answers the call. If however, no one responds to the voice prompt, the Maryland Relay will search for a TTY signal, then for ASCII, and repeat the sequence twice until a response is received. This process is completed quickly and efficiently, transparent to the user, to ensure that anyone who wishes, regardless of call answer preference can utilize the 7-1-1 access number. With this method, Maryland has been able to maintain an average speed of answer (ASA) of 3.0 seconds or less.

Although answering 7-1-1 with voice first has worked well for the State of Maryland, we encourage the FCC to allow each state to determine which answer mode to implement.

Once 7-1-1 is mandated nation wide, it will assist in easy access for travelers and in making Relay universally known. As a marketing tool, abbreviated dialing will assist the states in their outreach efforts. The general public, who use a standard phone are aware of, and make use of three digit dialing. They will quickly become aware of 7-1-1 and it's use in their lives. For these reasons, we strongly encourage the FCC to expeditiously mandate the implementation of 7-1-1 nationwide.

Respectfully Submitted,

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Gilbert Becker, Director
Telecommunications Access of Maryland
Maryland Relay

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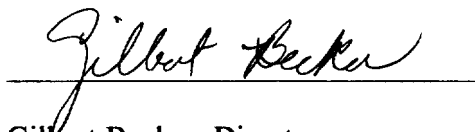
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